

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

SOUND INPATIENT PHYSICIANS, INC. AND) ROBERT A. BESSLER, M.D.,)) Plaintiffs,)) v.)) T.M. CARR, M.D.,)) Defendant) _____))	CIVIL ACTION NO. 2:19-cv-02034-TLP-atc
---	---	---

JOINT MOTION TO CONTINUE REMAINING DEADLINES

Defendant T.M. Carr, M.D. and Plaintiffs, Sound Inpatient Physicians, Inc. and Robert A. Bessler M.D., by and through undersigned counsel, hereby respectfully move this Court to continue and extend the remaining deadlines as set forth below:

<u>Deadline</u>	<u>Original Date</u>	<u>Extended Date</u>
All Discovery	September 4, 2020	December 18, 2020
Written Discovery	September 4, 2020	December 18, 2020
Depositions	September 4, 2020	December 18, 2020
Daubert Motions	October 5, 2020	January 15, 2021
Rule 26(e)(1) Supplementation	September 4, 2020	December 18, 2020
Dispositive Motions	October 5, 2020	January 15, 2021
Pretrial Order	January 29, 2021	March 29, 2021
Pretrial Conference	February 5, 2021	April 5, 2021
Trial	February 22, 2021	April 22, 2021

In support of this motion, the Parties state as follows:

1. To date, the Parties have engaged in extensive written discovery. However, given the uncertainty caused by the COVID-19 pandemic, the Parties delayed the taking of necessary depositions in this matter, hoping that recommended health and safety protocols would eventually permit the taking of depositions in person rather than remotely.

2. Because it appears that remote depositions will be required, or at least strongly recommended, for the foreseeable future, the Parties have agreed to proceed with the taking of depositions remotely, but they will be unable to complete all necessary depositions by the current September 4, 2020 discovery cutoff.

3. Counsel for the Parties have reviewed their respective schedules and believe they will be able to complete any remaining written discovery and complete depositions by December 18, 2020.

4. Counsel further request that all remaining deadlines are similarly extended in order to, among other things, afford this Court ample opportunity to consider dispositive motions and afford the Parties sufficient time to prepare for trial.

5. This motion is made in good faith and not for the purpose of delay.

THEREFORE, the Parties respectfully request the Court to issue an Order extending remaining deadlines as described herein.

/s/Pam Warnock Blair
Pam Warnock Blair
McNabb, Bragorgos, Burgess & Sorin, PLLC
81 Monroe, Sixth Floor
Memphis, TN 38103
pblair@mbbslaw.com

Attorneys for Defendant

/s/Mark S. Nebrig
Mark A. Nebrig
Emily C. Pera
Moore & Van Allen PLLC
100 North Tyron Street, Suite 4700
Charlotte, NC 28202
Telephone: 704-331-3596
Facsimile: 704-339-5896
marknebrig@mvalaw.com
emilypera@mvalaw.com

/s/John P. Passarelli

John P. Passarelli

Carol A. Svolos

The Omaha Building

1650 Farman Street

Omaha, NE 68102-2186

john.passarelli@kutakrock.com

carol.svolos@kutakrock.com

Attorneys for Plaintiff